



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

**SEP 08 2009**

Patricia A. Grantham  
Forest Supervisor  
Klamath National Forest  
1312 Fairlane  
Yreka, CA 96097-9549

Subject: Draft Environmental Impact Statement (DEIS) for the Eddy Gulch Late-Successional Reserve Fuels/Habitat Protection Project, Siskiyou County, CA (CEQ# 20090246)

Dear Ms. Grantham:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the above-referenced project. Our review and comments are pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

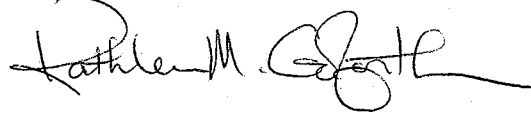
The Salmon River and Scott River Ranger Districts of the Klamath National Forest are proposing vegetation management for the purpose of protecting existing and future late-successional habitat and to reduce threat from wildfires to local communities and watersheds that may occur inside and/or outside the Eddy Gulch Late-Successional Reserve. The Proposed Action (Alternative B) would involve 25,969 acres of landscape-level treatments located in the Klamath National Forest.

EPA acknowledges the importance of project goals to improve forest health, reduce fuel loading, and protect communities and watersheds from wildfire threats. We support the best management practices described in the DEIS, such as minimizing new road construction and decommissioning roads after project activities have taken place to help reduce adverse environmental effects.

We have rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) (see enclosed "*Summary of Rating Definitions*"). We recommend that the Final Environmental Impact Statement (FEIS) provide additional information concerning a smoke management plan, worker exposure to naturally occurring asbestos, the wildland-urban interface (WUI), and noxious weeds. Please see the enclosed Detailed Comments for a description of these concerns and our recommendations.

We appreciate the opportunity to review this DEIS. When the FEIS is released for public review, please send one hard copy and one CD ROM to the address above (mail code: CED-2). In the meantime, we are available to discuss our comments. If you have any questions, please contact Jennifer Gagnon, the lead reviewer for this project, at (415) 947-4121 or Gagnon.Jennifer@epa.gov, or me at (415) 972-3521.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen M. Goforth". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kathleen M. Goforth, Manager  
Environmental Review Office

Enclosures:

Summary of EPA Rating Definitions

Detailed Comments

cc: Eddy Gulch LSR Project, c/o RED, Inc. Communication

# **SUMMARY OF EPA RATING DEFINITIONS\***

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

## **ENVIRONMENTAL IMPACT OF THE ACTION**

### ***"LO" (Lack of Objections)***

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

### ***"EC" (Environmental Concerns)***

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

### ***"EO" (Environmental Objections)***

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

### ***"EU" (Environmentally Unsatisfactory)***

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

## **ADEQUACY OF THE IMPACT STATEMENT**

### ***"Category 1" (Adequate)***

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

### ***"Category 2" (Insufficient Information)***

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

### ***"Category 3" (Inadequate)***

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

### **Air Quality**

***Provide a detailed smoke management plan describing the Siskiyou County Air Pollution Control District (SCAPCD) Smoke Management Program.*** The U.S. Environmental Protection Agency (EPA) acknowledges the need to reduce fuel, which may lead to a reduction of emissions from wildfires. Emissions from wildfires can be a major contributor of PM<sub>10</sub>, PM<sub>2.5</sub>, and CO (page 3-54, lines 5-6). The DEIS states that the Forest Service would coordinate with the appropriate air quality regulatory agencies during the planning and implementation of its resource management activities that affect air quality (page 1-21, lines 7-16).

#### ***Recommendation:***

The FEIS should include a detailed smoke management plan describing the SCAPCD's regulations for pile burning and smoke management, an implementation schedule, the responsible parties, and monitoring and reporting requirements.

### **Naturally Occurring Asbestos**

***Limit exposure to Naturally Occurring Asbestos.*** The DEIS states that asbestos can be introduced into the air by activities that include road construction, reconstruction, or maintenance on roads underlain by ultramafic rock (3-159, lines 5-6). The DEIS also states that ultramafic rock is concentrated in the southwest corner of the Assessment Area, and acknowledges the presence of serpentine geology in the project area (page 3-159, lines 7-9). Although serpentine soils may be limited, it is important to protect human health by limiting the exposure of workers to serpentine soils that may introduce airborne asbestos during vegetation management activities. Very low levels of asbestos in soil can generate airborne asbestos at hazardous levels. We are concerned about the potential exposure of workers to naturally occurring asbestos.

#### ***Recommendations:***

EPA recommends that the Forest Service determine whether or not naturally occurring asbestos is present in treatment units or along project access routes. If naturally occurring asbestos is found to be present, the FEIS should provide information on exposure mechanisms and assess the potential for exposure to elevated levels of airborne asbestos from proposed activities.

EPA recommends that the Forest Service review the asbestos occurrence information on the California Geological Survey website:  
[http://www.consrv.ca.gov/cgs/minerals/hazardous\\_minerals/asbestos/index.htm](http://www.consrv.ca.gov/cgs/minerals/hazardous_minerals/asbestos/index.htm)  
and the California Air Resources Board (CARB) regulations and guidance at:  
<http://www.arb.ca.gov/toxics/asbestos/asbestos.htm>. The CARB website addresses California's Asbestos Airborne Toxic Control Measures for Surfacing Applications, which apply to unpaved roads.

EPA also recommends that the Forest Service review the recommendations presented in the Department of Toxic Substances Control report, "Study of Airborne Asbestos from a Serpentine Road in Garden Valley, California" at:

The FEIS should identify and include commitments for measures that can be implemented to protect human health from naturally occurring asbestos, if appropriate, and include this discussion in the FEIS.

### **Wildland-Urban Interface**

#### ***Describe how the Community Wildfire Protection Plan relates to the proposed project.***

A main component of the purpose and need for this project is to provide fire protection for the wildland-urban interface (WUI) (page 1-11, lines 18-19). The Healthy Forest Restoration Act (HFRA) encourages the development of Community Wildfire Protection Plans (CWPPs) under which communities designate their WUIs and the locations where fuel reduction projects may take place. A summary of the Salmon River CWPP is provided in the DEIS (page 2-4, line 31 through page 2-5, line 10).

#### ***Recommendations:***

The FEIS should further describe actions that will be taken by the Forest Service and the communities to ensure fire protection efforts are consistent, complementary, and fully integrated with the preferred alternative. For instance, describe whether local building and fire safety ordinances are consistent with the effort to reduce and minimize excessive fuels.

### **Noxious Weeds**

The DEIS states that a total of 24 high-priority weeds are found on the Klamath National Forest Noxious Weed List (page 3-205, lines 7-8). A Weed Risk Assessment identified this project as having a moderate to high risk of introducing or spreading noxious weeds (3-209, lines 36-37). The DEIS states that the Forest Service will implement prevention, control, and monitoring activities to prevent noxious weeds from infesting areas in the Project Area (page 2-30, lines 1-27). The Forest Service identifies several noxious weed resource protection measures (RPMs) for each treatment activity. For example, if noxious weeds were found in the area during prescribed burn treatments, there would be an omission of prescribed burn treatments and fireline construction within weed populations, cleaning of all equipment before entering treatment units, post-treatment surveys, site-specific surveys, and monitoring of noxious weed sites to ensure that natural vegetation has recovered from the disturbance (page 3-211, lines 29-33). While these measures are commendable, the DEIS does not specifically state what measures the Forest Service would take to manage or eradicate noxious weeds if they were found at the project sites.

#### ***Recommendation:***

The Forest Service should indicate precisely what treatment methods would be used if noxious weeds were found, and any potential impacts they could cause. We also suggest that the Forest Service consider incorporating noxious weed management or eradication treatments as part of the project design.